



Federal Communications Commission
Washington, D.C. 20554

February 9, 2022

The Honorable Karen Charles Peterson
Commissioner, Massachusetts Department of Telecommunications and Cable
Chairwoman, North American Numbering Council
1000 Washington Street, Suite 600
Boston, Massachusetts 02118

Re: Numbering Administration Oversight Working Group

Dear Chairwoman Charles Peterson:

For decades, Commission telephone number policies have been substantially driven by a desire to conserve finite numbering resources. Within this framework, the Commission has delegated many numbering duties to the state and territorial regulatory commissions, as they are uniquely situated to assess the specific needs of their respective jurisdictions and the conservation measures needed. Conservation methods enable the more efficient use of telephone numbers, which is important in forestalling the need for creation of new area codes and all of the attendant effects accompanying them.¹ In this vein, the Commission seeks the advice and expertise of the North American Numbering Council (NANC) to explore the possibility of improved and innovative conservation and utilization options to ensure that the nation's numbering resources will last as long as possible.

Multiple state regulatory commissions are proposing that the Commission explore a different conservation method, individual telephone number (ITN) pooling, as a means of continuing the status quo of only one area code in their states for as long as possible. They maintain that the continued use of only one area code statewide benefits their states' residents and businesses. The proposed ITN pooling method involves a numbering administrator (presumably the North American Numbering Plan Administrator/Pooling Administrator (NANPA/PA))² assigning telephone numbering resources one telephone number at a time, rather than at the current pooling level – blocks of 1,000 numbers. The Wireline Competition Bureau has sought comment on two state regulatory commission proposals to trial ITN pooling, as well as a petition filed by one of them, the Maine Public Utilities Commission, asking the

¹ New area codes are an extensive undertaking requiring network modifications, and their effect on telephone subscribers requires significant consumer education programs. Also, importantly, such conservation helps avoid the prospect of eventual exhaust of the entire North American Numbering Plan.

² The pertinent functions would likely be most similar to those of the PA. We refer to those functions in combination with the NANPA, as they are now combined under a single Commission contract. *See* FCC Selects SomosGov as Next Telephone Number Administrator and Reassigned Numbers Database Administrator (Dec. 21, 2020), <https://docs.fcc.gov/public/attachments/DOC-368493A1.pdf>.

Commission to direct the NANPA to report on the technical, operational, and cost requirements to implement ITN pooling for Maine's 207 area code on a trial basis.³

The NANC has previously studied the feasibility of ITN pooling, and last reported on it in October 2000.⁴ While the *2000 NANC Report* was instructive, it is now more than two decades old. To develop current options for methods of conserving numbering resources, the Commission seeks again to avail itself of the NANC's considerable expertise through a fresh, more in-depth examination of ITN pooling. We direct the NANC, through its Numbering Administration Oversight Working Group (NAOWG)⁵ to submit a report, no later than August 15, 2022, addressing the following topics with particularity, using multiple specific examples and data wherever possible:

- Any updates to the underlying facts or conclusions in the *2000 NANC Report* that the NANC believes would be useful to the Commission.
- The feasibility of ITN pooling trials, including technical, operational, and cost considerations with respect to the entity administering the pooling (such as the Pooling Administrator), service providers, and other stakeholders;
 - If ITN pooling trials are not feasible, the time, level of effort, and cost of remedying any technical and/or operational issues;
- The extent to which service providers may have difficulty incorporating both methods of pooling (thousands-block and ITN) in their network if providing service both inside and outside of any trial area;
- The extent to which service providers that do not obtain telephone numbering resources in the area in which any ITN pooling trial is conducted would be negatively affected by such trial;
- Which entities (such as the NANPA/PA) are capable of implementing any ITN pooling trial, and which may be most suitable;
- The amount of time it might take to implement, conduct, and determine the success of any trial, and how success should be measured;
- How the number of ITN pooling trials being conducted would affect the NANC's findings; and

³ *Wireline Competition Bureau Seeks Comment on Maine Public Utilities Commission Numbering Request*, CC Docket No. 99-200, Public Notice, DA 21-1012 (WCB Aug. 18, 2021); *Wireline Competition Bureau Seeks Comment on New Hampshire Public Utilities Commission Petition For Additional Delegated Authority to Implement Individual Telephone Number Pooling in the 603 Area Code*, CC Docket No. 99-200, Public Notice, 34 FCC Rcd 3837 (WCB 2019). We note that following our 2021 public notice, the North Dakota Public Service Commission also filed a petition seeking to include North Dakota in such a trial. Petition by the North Dakota Public Service Commission for Additional Delegated Authority to Implement Number Optimization Measures in the 701 Area Code and Comments in Support of the Petition by the New Hampshire Public Utilities Commission and Maine Public Utilities Commission For Additional Delegated Authority to Implement Number Optimization Measures, CC Docket No. 99-200 (filed Sept. 10, 2020), <https://ecfsapi.fcc.gov/file/10915001409941/doc02766620210915094250.pdf>.

⁴ See Number Resource Optimization Working Group, N. Am. Numbering Council, Report – *NANC Recommendation on Individual Telephone Number (ITN) Pooling* (rec. Oct. 30, 2000), <https://www.fcc.gov/ecfs/filing/5507216154> (2000 NANC Report).

⁵ We have selected the NAOWG for this task because many of the pertinent issues appear to involve the work of the NANPA/PA, which the NAOWG (through the NANC) assists the Commission in overseeing. In this function, and by virtue of its composition, the NAOWG also is well abreast of interaction among numbering resource stakeholders, the NANPA/PA and the other numbering resource administrators.

- Any suggestions the NANC may have for alternative means, other than ITN pooling, of tailoring numbering resource allocation closer to actual service provider needs and enhancing conservation and utilization.

Time is of the essence in considering these matters. While the NANC works to develop this report, and the Commission later considers it, Maine and North Dakota's single area codes will be moving further toward exhaust. In that regard, we are separately seeking comment on whether Commission rules should be conditionally waived so as to direct the NANPA/PA, using its Jeopardy procedures, to begin rationing numbering resources in Maine and North Dakota with the intent of forestalling exhaust in the area code until at least five years from now, rather than the earlier exhaust dates presently forecasted.⁶ Such an approach would provide the Commission additional time to make the most informed decision about whether to permit any ITN pooling trial in Maine, North Dakota, and perhaps elsewhere, and if permitted, time for such trial to slow the exhaust of numbering resources.

If you have questions about this referral, please contact Christi Shewman, the NANC's Designated Federal Officer, at christi.shewman@fcc.gov. We appreciate the NANC's long-standing role in aiding the Commission in its efforts to optimize use of the finite telephone numbering resources in the North American Numbering Plan in a manner most beneficial to the people served by it.

Sincerely,



Bureau Chief

Kris Anne Monteith
Chief
Wireline Competition Bureau, FCC

⁶ See Wireline Competition Bureau Seeks Comment on Potential Waiver of Section 52.13 of the Commission's Rules with Respect to Area Codes 207 and 701, CC Docket No. 99-200, Public Notice, DA 22-130 (Feb. 9, 2022).